

From: [Halasz, Stephen \(Austin,TX-US\)](#)
To: [Gary Moore/R6/USEPA/US@EPA](#)
Cc: [Richard Bergner](#)
Subject: RE: Falcon Refinery
Date: 02/13/2012 03:31 PM

Gary,

For the most part what you wrote is correct. I'm not sure that the internal floater on Tank 12 will be removed or just raised to enable removal of the small amount of sludge that remains. Tank 7 is down to just containing solid sludge (paraffin) and Blue Dolphin is evaluating whether we can remove the top of the tank so we can just use a front end loader to remove the solid sludge. Tank 30 has an external floating roof that will need to be removed.

Any tanks that remain intact will be inspected to ASTM standards.

The remainder of items are correct and the minimal asbestos was removed years ago. We'll supply you with the irrigation details you requested.

From: Gary Moore [mailto:Moore.Gary@epamail.epa.gov]
Sent: Monday, February 13, 2012 3:18 PM
To: Halasz, Stephen (Austin,TX-US)
Subject: Falcon Refinery

Stephen:

Thanks for the updated report. I have the following questions:

If I understand things correctly, the following are the remaining activities:

1. Tank 7,12, and 30: Internal roofs need to be removed so remaining liquid and sludge can be removed. If the tanks are going to be retained, the tanks will be inspected by API 653 to determine repairs needed. If the flooring is damaged (holes, cracks, etc.), such flooring will be removed and the contamination excavated and properly disposed.
2. Tank 26/Wastewater Treatment: Wastewater Treatment System will be installed to treat the water from Tank 26 and irrigate it onsite. Upon completion of the treatment/irrigation activities, the remaining sludge within Tank 26 will be removed and disposed. Tank 26 will then be inspected by API 653 to determine repairs needed. If the flooring is damaged (holes, cracks, etc.), such flooring will be removed and the contamination excavated and properly disposed.
3. All piping and equipment throughout the facility will be completely drained of all materials and properly handled as product or waste as appropriate.
4. All visibly contaminated soils on the Falcon Refinery/NORCO property will be removed and disposed. The RI/FS will determine the fate of the non-visibly contaminated soils throughout the property.

Please let me know if there are other items that are being addressed that have not yet been completed.



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On another note, I would like the following information provided to me:

- Copy of Wastewater Treatment and Irrigation Plan
- Copy of the Analytical for the Raw Water that is going to be treated from Tank 26 (Full analytical should have already been done for designing the system). Does this water exhibit a hazardous waste characteristic or toxicity characteristic? If so, the LDRs may apply. Has this been checked out?
- It is my understanding that the refinery unit will be kept intact rather than demo for use by the new owner (all materials must be removed from all this piping and equipment as part of this removal). Also, any asbestos materials within the refinery unit and the whole facility should have already been removed during the early stages of the cleanup.

I will be calling Blue Dolphin shortly to discuss the above.

Thanks

Gary Moore
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From: "Halasz, Stephen (Austin,TX-US)" <SHalasz@trcsolutions.com>
To: Gary Moore/R6/USEPA/US@EPA, Richard Bergner <rbergner@rflaw.net>
Date: 02/06/2012 01:15 PM
Subject: error

Gary,

In last week's progress report in Section 1, I incorrectly indicated that the Purchaser of the refinery is scheduling the removal of Tank 30. I meant to say that the Purchaser is scheduling the removal of the roof. I have included a corrected report.

Stephen Halasz
Program Manager

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